

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Ezel McElroy

Case No. 2:21-mj-30139
Judge: Unassigned,
Filed: 03-18-2021

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2018-January 2019 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C § 1344	Bank Fraud
18 U.S.C § 1349	Conspiracy to Commit Bank Fraud

This criminal complaint is based on these facts:

Please see attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 18, 2021

City and state: Detroit, MI



Complainant's signature

Thomas Cardinali- Special Agent

Printed name and title



Judge's signature

Patricia T. Morris- US Magistrate Judge

Printed name and title

AFFIDAVIT

I, Thomas Cardinali, being duly sworn, state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States Secret Service and am assigned to the Detroit Field Office. I have been employed as a Special Agent since December 2017. I have a Bachelor of Science degree with a focus in Criminal Justice, and I have received training in general law enforcement and criminal investigations at the Federal Law Enforcement Training Center and at the United States Secret Service Rowley Training Center.
2. I have further received specialized training regarding counterfeiting and fraud, including violations of Title 18 U.S.C § 1344 (relating to bank fraud). I have been trained in methods and traits commonly associated in financial fraud.
3. This affidavit is in support of a complaint and arrest warrant for Ezel McElroy. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not

included each and every fact known to me concerning this investigation.

4. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation, law enforcement reports that I have reviewed, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

II. INVESTIGATION AND PROBABLE CAUSE

5. In October of 2018, investigators from Fifth Third Bank, Comerica Bank, and PNC Bank provided information to the U.S. Secret Service regarding a check fraud scheme involving a group of individuals who attempted to defraud the three banks of \$1,855,588.39 using 239 fraudulent checks that were cumulatively deposited at the three banks. Fifth Third Bank and Comerica Bank identified Ezel McElroy as the leader of the fraud ring. The fraud ring would pay account holders for the use of his or her account.

Once an account was obtained, a counterfeit or fraudulent business check would be created in the account holder's name, and the check would be deposited into the account. Money would usually be withdrawn from the account using an ATM, wire transfer, or check cashing store.

6. Between March 14, 2018, and January 4, 2019, bank surveillance captured Ezel McElroy deposit 20 fraudulent checks totaling \$92,035.75.
7. On December 31, 2018, McElroy deposited a fraudulent check into the account of M.S. totaling \$5,940.13. On January 1, 2019, McElroy withdrew \$800.00 from the account via ATM.
8. On November 20, 2018, McElroy deposited a fraudulent check into the account of T.T. totaling \$5,450.00.
9. On January 24, 2018, I interviewed T.T. T.T. identified McElroy as the individual who recruited him on Instagram under the username @therealcrispye__. T.T. stated that McElroy told him to open a Fifth Third Bank account and get a 360 card. McElroy retrieved the card from T.T. but

later told T.T. that “It didn’t work,” so McElroy picked up T.T. and drove him around to different branches to attempt deposits.

10. Between April 30, 2018, and November 2, 2018, bank surveillance captured L.B. attempt to deposit 46 fraudulent checks totaling \$223,042.39, including deposits into the accounts of D P. and N.M. Bank surveillance captured McElroy accessing four of the 46 accounts via ATM, including the account of M.H. after L.B. deposited the first of two checks into M.H.’s account.
11. I interviewed L.B. on January 5, 2021, and L.B. stated that McElroy would go to L.B.’s house and use his laptop to make checks. L.B. said that he was present when McElroy picked up bank cards from account holders, and would make the checks after the bank cards were collected. L.B. also stated that McElroy would give him checks in other people’s names and tell him where to make each deposit. L.B. said that McElroy would pay him \$500.00 for each check that he deposited.

12. On May 30, 2018, and May 31, 2018, L.B. deposited a fraudulent check into the account of N.B.. On May 31, 2018, McElroy withdrew \$400.00 from N.B.'s account via ATM.
13. On June 4, 2018, L.B. deposited a fraudulent check into the account of M.H. On June 5, 2018, McElroy withdrew \$360.00 from M.H.'s account via ATM.
14. I interviewed M.H. on February 12, 2020, and he admitted to providing Ezel McElroy with his personal bank account so that McElroy could deposit fraudulent checks into his account in exchange for about \$1,000.00. Four fraudulent checks were deposited into M.H.'s Fifth Third Bank account totaling \$19,358.75. Hobson said that he witnessed Ezel McElroy manufacture checks.
15. Between August 29, 2018, and September 10, 2018, bank surveillance captured D.P. deposit four fraudulent checks totaling \$36,032.44. I interviewed one of the account holders, C.P., and she stated that D.P. is her son. C.P. said that Perry told her "E" had a check; and all she had to do was give him her bank account, and "E" would deposit the

check into her account and bring her the money. C.P. stated that D.P. deposited checks into her Fifth Third Bank and Bank of America accounts. “E” is a nickname that multiple associates of McElroy have used to identify him.

16. Between June 28, 2018, and July 24, 2018, bank surveillance captured N.M. deposit ten fraudulent checks totaling \$47,820.16, including one into the account of D.P.. I interviewed N.M. on March 3, 2020, and he stated that D.W. would give him \$100.00 and provide him with checks and tell him where to deposit each one. N.M. stated that D.W. was not the one making checks, but he would recruit account holders on Snapchat and Instagram. N.M. stated that D.W. explained the scheme as “E’s thing,” and identified a picture of Ezel McElroy as “E,” whom he met one time.
17. A search warrant executed on a cell phone belonging to Ezel McElroy revealed that he paid M.W. \$15,000.00 to teach him how to manufacture fraudulent checks. M.W. admitted to manufacturing checks during an interview with detectives from the Van Buren Police Department and Ann Arbor

Police Department in 2018.

18. Between December 13, 2018, and January 23, 2020, bank surveillance captured S.M. attempting to deposit \$440,059.73 in fraudulent checks. A search warrant executed on S.M.'s phone showed that S.M. was usually working at the direction of M.W., but also received account information from D.W., M.K., and others. M.W. would text S.M. the name, address, and account information belonging to account holders, and tell S.M. what amount and business name to put on a check, and where to make each deposit.
19. I interviewed S.M. on March 5, 2020, and she identified a picture of McElroy as someone she met once. She said that M.W. gave her his number when she needed checks made, and McElroy made checks for her.
20. When I interviewed L.B. on January 5, 2021, I asked him if he knew S.M. and her screen name, "ssammysosaa," and he said that he was present when McElroy gave her checks to deposit.
21. On December 16, 2018, M.K. provided Ezel McElroy with his

personal Bank of America and JP Morgan Chase account information through text message. On January 29, 2018, a counterfeit Covenant Construction check totaling \$1,979.17 was remotely deposited into the Chase account of M.K..

22. K.P. worked for Covenant Construction and previously told detectives that McElroy contacted him and offered K.P. cash in exchange his JP Morgan Chase bank card, PIN, and online banking login information. K.P. stated that he provided McElroy with everything he requested, and that McElroy was able to view the Covenant Construction check while logged into K.P.'s online account, and McElroy told K.P. that he "remade" the check.
23. The vast majority of deposits and withdrawals identified in this complaint occurred at various locations within the Eastern District of Michigan.

III. CONCLUSION

24. Based on the above investigation, probable cause exists that Ezel McElroy engaged in bank fraud and conspiracy to commit, in violation of 18 U.S.C §§ 1344 and 1349.

Respectfully Submitted,



Thomas G. Cardinali
Special Agent,
U.S. Secret Service